

AO 91 (Rev. 03/09) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

Southern District of Texas

United States of America

v.

Maria Guadalupe VALENZUELA-Martinez  
(YOB: 1968; Mexico)

Case No. M-19-3175 -M

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of December 30, 2019 in the county of Hidalgo in the  
Southern District of Texas, the defendant(s) violated:

Code Section  
21 USC Section 841

Offense Description  
Knowingly and intentionally possess with the intent to distribute approximately 8.96 kilograms of cocaine, a Schedule II controlled substance in violation of 21 United States Code Section 841.

This criminal complaint is based on these facts:

SEE ATTACHMENT "A"

☒ Continued on the attached sheet.

Approved by AUSA S. DIPIAZZA

*S. DiPiazza*

*[Signature]*

Complainant's signature

Ryan McTaggart Special Agent HSI

Printed name and title

Sworn to before me and signed in my presence.

Date: 12/31/19 - 8:21 A.M.

*[Signature]*

Judge's signature

City and state: McAllen, Texas

Juan F. Alanis United States Magistrate Judge

Printed name and title

AFFIDAVIT

On December 30, 2019, Maria Guadalupe VALENZUELA-Martinez (hereafter referred to as VALENZUELA-Martinez), the driver, and sole occupant, of a Chevrolet Malibu bearing Mexico license plates presented herself for admission at the Anzalduas, Texas, Port of Entry.

VALENZUELA-Martinez was referred for secondary inspection and, during secondary inspection, approximately eight (8.96kgs) kilograms of cocaine was discovered concealed inside the center console of the vehicle.

In a post Miranda warning statement VALENZUELA-Martinez stated VALENZUELA-Martinez had been recruited by an individual in Mexico to drive a vehicle which VALENZUELA-Martinez thought contained a controlled substance across the United States / Mexico International Boundary.

VALENZUELA-Martinez stated VALENZUELA-Martinez knew what VALENZUELA-Martinez was doing was illegal and VALENZUELA-Martinez was going to be paid \$1,000.00 USD for driving the vehicle from Mexico into the United States.